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8 Attorneys for Defendant
DHTLA MOTORS, LLC dba HYUNDAI
9 OF DOWNTOWN LOS ANGELES
(erroneously sued and served as DHTLA
10 MOTORS, LLC d/b/a HYUNDAI OF
DOWNTOWN LA)
11

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA
14

15 WYATT BULS, individually and on
behalf of all others similarly situated,

16 Plaintiff,

17 v.

18 DHTLA MOTORS, LLC d/b/a
19 HYUNDAI OF DOWNTOWN LA

20 Defendants.
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Case No. 2:25-cv-03128-DSF (ASx)

**DECLARATION OF ADAM D.
BOWSER IN RESPONSE TO
ORDER TO SHOW CAUSE RE
SANCTIONS**

**DECLARATION OF ADAM D. BOWSER IN RESPONSE
TO ORDER TO SHOW CAUSE RE SANCTIONS**

I, Adam D. Bowser, declare as follows:

1. I am a partner at ArentFox Schiff LLP and counsel of record for Defendant in this matter. I submit this declaration in response to the Court's June 12, 2025 Order to Show Cause Re Sanctions (ECF No. 22).

2. **Persons Responsible for Meeting with Opposing Counsel:** I conducted the Rule 26(f) conference with Plaintiff's counsel, Mr. Paronich, and served as the primary point of contact for that discussion. I also participated in subsequent communications with opposing counsel, regarding the drafting of the portions of the Joint Rule 26(f) Report and Schedule of Pretrial and Trial Dates specific to Defendant and otherwise finalizing the Joint Report with Plaintiff's counsel. All communications with Plaintiff's counsel were professional, and the Parties cooperated in good faith throughout the process.

3. **Persons Responsible for Preparing, Reviewing, and Ensuring Accuracy and Compliance:** On behalf of Defendant, I reviewed and added the portions of report and schedule specific to Defendant as drafts were exchanged between counsel to ensure compliance with the Court's Order Setting Scheduling Conference.

4. **Why the Report Failed to Comply with the Court's Order:** Unfortunately, after multiple dates were exchanged between the parties and in effort to agree on all later case dates, I agreed to Plaintiff's proposed dates in the Schedule of Pretrial and Trial Dates, and regrettably certain dates were modified to no longer fall on the correct weekday or otherwise failed to comply with the Court's directive. In addition, certain sections of the report were inadvertently omitted and/or the requested information was contained in other parts of the original report.

5. **Corrective Actions and Apology:** After receiving the Court's Order

1 to Show Cause, I promptly met again with Plaintiff's counsel to carefully review
2 and revise the Joint Report and Schedule. The Parties have since agreed on a
3 corrected set of proposed deadlines and revisions. We believe the revised filing
4 complies fully with the Court's format, calendaring, and content requirements.

5 6. I sincerely apologize to the Court for the oversight and any resulting
6 inconvenience. The errors were inadvertent and the result of coordination and
7 revision issues during drafting. I take the Court's rules and orders seriously and will
8 ensure full compliance going forward, and respectfully request that no sanctions be
9 imposed.

10 I declare under penalty of perjury under the laws of the United States that the
11 following is true and correct.

12 Executed on June 18, 2025, in Lucketts, Virginia.

13
14 Respectfully submitted,

15
16 /s/ Adam Bowser

17 Adam Bowser

18 ArentFox Schiff LLP

19 Attorneys for Defendant
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